

**LORI HARPER SUEK**  
**Assistant U.S. Attorney**  
**U.S. Attorney's Office**  
**James F. Battin U.S. Courthouse**  
**2601 Second Ave. North, Suite 3200**  
**Billings, MT 59101**  
**Phone: (406) 657-6101**  
**FAX: (406) 657-6989**  
**E-Mail: Lori.Suek@usdoj.gov**

**ATTORNEY FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**BILLINGS DIVISION**

<b>UNITED STATES OF AMERICA,</b>	<b>CR 18-21-BLG-SPW</b>
<b>Plaintiff,</b>	
<b>vs.</b>	<b>OFFER OF PROOF</b>
<b>RICHARD PAUL HALL,</b>	
<b>Defendant.</b>	

The defendant, Richard Paul Hall, is charged by indictment with distribution of methamphetamine, in violation of 21 U.S.C. § 841(a)(1).

## **PLEA AGREEMENT**

Hall will plead guilty to the indictment. The United States presented all formal plea offers to Hall in writing. The plea agreement entered into by the parties and filed with the Court represents, in the government's view, the most favorable offer extended to Hall. *See Missouri v. Frye*, 566 U.S. 134, 145-46 (2012).

## **ELEMENTS OF CHARGE**

In order for Hall to be found guilty of distribution of methamphetamine, as charged in the indictment, the United States must prove each of the following elements beyond a reasonable doubt:

**First**, the defendant knowingly distributed methamphetamine; and

**Second**, the defendant knew that it was methamphetamine or some other prohibited drug.

Although not an element of the offense, the United States would be required to prove beyond a reasonable doubt that the defendant distributed 50 or more grams of actual methamphetamine.

## **PENALTY**

The offense carries a mandatory minimum sentence of ten years and a maximum sentence of life imprisonment, a \$10,000,000 fine, at least five years of supervised release, and a \$100 special assessment.

## **ANTICIPATED EVIDENCE**

If this case were tried in United States District Court, the United States would prove the following:

On August 3, 2016, officers with the Billings police department were dispatched to a location in Billings. A citizen called in to complain that a man was sleeping in a vehicle outside of the citizen's residence. Officers responded and found Jesse James Meyers with four bags of methamphetamine on his lap. Billings task force agents responded and began an investigation.

Meyers identified Hall as the individual that supplied him with the methamphetamine. Meyers explained that he met Hall at Hall's apartment, on August 2, 2016, to pick up the methamphetamine that he had on his lap. Meyers drove with agents to the apartment and pointed it out to them. Meyers described Hall as "an old guy."

The Billings drug task force agents were familiar with Hall and, because Hall was on state probation at the time, the agents confirmed that Hall was living at the apartment identified by Meyers. Meyers further explained that he met Hall about one month prior to his arrest, and he met an individual named Tate Dollar about two weeks before Hall. Meyers reported that Hall and Dollar worked together distributing methamphetamine.

Dollar was interviewed and confirmed the information provided by Meyers.

The methamphetamine seized from Meyers was tested and weighed at the DEA laboratory. Meyers possessed 223 grams of pure methamphetamine that was supplied to him by Hall.

DATED this 8th day of May, 2018.

KURT G. ALME  
United States Attorney

/s/ Lori Harper Suek  
LORI HARPER SUEK  
Assistant U.S. Attorney